



SENT VIA CM/ECF

January 14, 2025

Hon. Brenda K. Sannes
Chief Judge
United States District Court for the Northern District of New York
Federal Building and US Courthouse
P.O. Box 7336
Syracuse, New York 13261-8593

Sarhadi v. Geever, et al., Civil Action No. 24-cv-00031 (BKS/CFH)

Dear Judge Sannes:

McAllister Olivarius represents the Plaintiff, Kristina Sarhadi, in the above referenced matter. Pursuant to Local Rule 7.1(j), Plaintiff submits this motion for extension of time to file her motion for default judgment as to Defendant Justin Geever a/k/a Justin Sane ("Geever").

On December 18, 2024, the Court issued an order instructing Plaintiff to file her motion for default judgment as to Geever, pursuant to Rule 55(b) and Local Rule 55.2, within 30 days. ECF No. 40.

Plaintiff has faced some delay in collecting information pertinent to her motion for default judgment because of the Christmas and New Year holidays. As such, Plaintiff seeks a brief extension of time to submit her motion for default judgment.

Plaintiff's timely motion for extension of time is made in good faith and not for an improper purpose or to unduly delay the litigation of these proceedings. Plaintiff has not previously sought the relief requested in the instant motion.

McALLISTER
OLIVARIUS

Plaintiff respectfully requests that the Court grant her motion for extension of time to file her motion for default judgment to January 31, 2025 and for any other relief this Honorable Court deems just and proper.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Dr. McAllister", is written over a light blue rectangular background.

Dr. John McAllister
Counsel for Plaintiff

cc: Counsel of Record [Via CM/ECF]